

**Customer Proprietary Network Information (CPNI)**  
**Statement of CPNI Compliance**  
**Annual 47 C.F.R. §64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**

**Annual Certification Processes Summary**  
**Certification for 2012 covering the prior calendar year 2011**

**The Statements below describe the procedures and actions taken to ensure that Mid Century is in compliance with the FCC's CPNI Rules**

<b>A. Employee CPNI Training</b>	Mid Century (MCTC) continues to be proactive in ensuring its employees are properly updated and trained in procedures related to CPNI. Employees are trained annually, at a minimum. Training includes, but is not limited to, examples of when employees are and are not authorized to use CPNI. Focus of CPNI also extends in to Mid Century's Red Flag Identity Theft Prevention Program. Employee training is documented and properly retained.
<b>B. Disciplinary – Improper Disclosure of CPNI</b>	MCTC's CPNI policy includes an express disciplinary process for employee infractions. There were no CPNI employee infractions for 2011.
<b>*C. Process for Opt-in and Opt-out</b>	MCTC markets to its customers using the Opt-out approach, when applicable. MCTC does not participate in 3 <sup>rd</sup> party marketing and therefore Opt-in has not been utilized. As required by CPNI rules, an Opt-out letter and Opt-out form are to be mailed to customers every 2 years. Mid Century complied with its scheduled mailing of these documents in December 2011. Mid Century will also mail these notification documents to customers when it or its affiliate companies run certain sales or marketing campaigns. There were no applicable sales or marketing campaigns for 2011. Occasionally, a CEI (MCTC's long distance subsidiary) representative may ask the customer for oral consent to use the customer's CPNI for the purposes of providing the customer with an offer for products or services not related to the telephone services to which the customer subscribes. If customer oral consent is granted, we may use the customer's CPNI for the duration of such telephone call in order to offer additional services. Detailed comments are noted to customer accounts when Opt-out letter and Opt-out form is mailed, when an Opt-out election form is received from a customer, or when using oral consent.

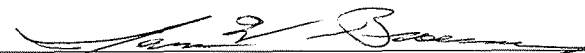
<b>D. Actions taken against data brokers (Pretexters)</b>	No known Pretexter violations (breaches) occurred to necessitate any such actions for the year 2011.
<b>E. Pretexters process(es) – attempt to access CPNI</b>	No known access to CPNI by Pretexters (breaches) was reported for the year 2011.
<b>F. Customer Complaints – Unauthorized release of CPNI</b>	No customer complaints were received as a result of unauthorized release of CPNI for the year 2011.
<b>G. Process to ensure Opt-out elections are recorded &amp; followed</b>	Customers may call our business office, or our 24/7 voicemail CPNI line, come in to one of our business office locations, e-mail us, utilize the Opt-out form that is mailed to them, or access the form on our website in order to deny or approve our use of their CPNI to offer products or services not related to the telephone services to which the customer currently subscribes. Service order processing and Customer Service Representative procedures are in place in MCTC's billing system to record Opt-out elections and are strictly practiced on a daily basis. Follow-up verification of Opt-out restrict or un-restrict may be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure extraction of customer's Opt-out elections as necessary. Record of approval or disapproval is retained for a minimum of 3 years.
<b>H. Other CPNI Compliance measures</b>	<p>Access to customer CPNI is limited to authorized personnel and restriction pass codes are used to facilitate safeguard assurance. Release of call detail information, including, but not limited to, the establishment of password protection and a secret question and answer have been implemented. The customer password is not derived from readily available biographical or account information. Notification of customer account changes is strictly practiced on a daily basis.</p> <p>Mid Century's CPNI enhancements to its billing software and online access include safeguard provisioning for its affiliate companies.</p> <p>Past enhancements to Mid Century's customer online account access provide that a Customer Service Representative authenticate, register, and provide system-generated passwords to customers seeking online access. Additionally, incorporated into the online system, a prompt is sent through to the billing system in a process to send customer notification letters for online account changes when applicable.</p> <p>For year 2011, billing software enhancements include:</p> <ul style="list-style-type: none"> <li>❖ Implemented a new Payment Processor, credit card platform, which ensures customer credit card information is safeguarded and limited in scope to the last four digits of the card number and expiration month/year. MCT does not store credit card details on its server. Customers may set up their own credit card payment processing account and pass phrase via MCT's online bill payment software (Estatement).</li> </ul>

<b>H. Other CPNI Compliance measures-cont.</b>	<ul style="list-style-type: none"> <li>❖ Online access to Payment Processor and Estatement is blocked after six consecutive unsuccessful attempts to log on. Once blocked, a customer must contact our business office to delete the account and re-establish a new account.</li> <li>❖ The above measures strengthen Mid Century and its affiliates CPNI and PCI compliance.</li> <li>❖ Specific to Mid Century's CPNI Policy and complementary to its Red Flag Program, administrative functions include controls to restrict the display of customer social security and bank information to authorized users.</li> <li>❖ Mid Century's long distance provider, ANPI ZONE, on behalf of Mid Century's long distance subsidiary, Century Enterprises, Inc. implemented blocking precautions to calls terminating to fraudulent international numbers to mitigate fraud/abuse.</li> </ul>
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**\*Mid Century will honor any customer CPNI elections it receives by recording the restriction or non-restriction to the company and to its affiliate companies, Century Enterprises, Inc. and Cencomm, Inc., customer account record.**

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Date Filed: January 27, 2012

Signed:   
James W. Broemmer / CEO

Reference: MCTC CPNI Policies and Procedures Manual Section VII. Annual Certification